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Attorneys for Plaintiff
The Board of Trustees of The Leland Stanford Junior
University

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

The Board of Trustees of The Leland Stanford
Junior University,

Plaintiff,

v.

Stanford Financial Group Company and Stanford
Group Company,

Defendants.

No. 3:08-cv-04950 CRB

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO DEFENDANT
STANFORD GROUP COMPANY'S
COUNTERCLAIMS**

Existing Date: May 8, 2009
Stipulated Date: June 12, 2009

Hon. Charles R. Breyer

Pursuant to Civil L.R. 7-7(a) and the Court's Standing Order, all parties to this action, by
and through their respective counsel or record, hereby stipulate as follows:

On February 13, 2009, Defendant Stanford Group Company filed a document containing
six counterclaims against Plaintiff Stanford University ("Stanford"). Document No. 78. After
the Northern District of Texas entered an order freezing the assets of Defendants Stanford
Financial Group Company and Stanford Group Company (the "Defendants") and appointed a
Receiver to exercise control and possession of the Defendants' assets (the "Receiver"), on
February 24, 2009 the Court entered an order granting the parties' request to extend Stanford's
time to respond to Stanford Group Company's counterclaims to May 8, 2009. Document No. 87

Since that order was entered, Stanford and the Receiver have engaged in settlement

Case No. 3:08-cv-04950 CRB

1 discussions and are working to finalize a resolution of this action. While the parties have been
2 working diligently to reach a resolution, it is unlikely that a final agreement can be reached
3 before the May 8, 2009 deadline for Stanford's response to Defendant Stanford Group
4 Company's counterclaims. To provide the parties time to resolve their disputes, Stanford and the
5 Receiver wish to extend the time for Stanford to respond to Stanford Group Company's
6 counterclaims to June 12, 2009. Further, the parties wish to extend the time for the Defendants
7 to respond to pending discovery requests from May 4, 2009 to June 5, 2009.

8 NOW THEREFORE, IT IS SO STIPULATED between the parties that there is good
9 cause for the Court to enter an order extending the time for Stanford to respond to Stanford
10 Group Company's counterclaims from May 8, 2009 to June 12, 2009.

11 IT IS FURTHER STIPULATED that the time for the Defendants to respond to pending
12 discovery requests is extended from May 4, 2009 to June 5, 2009.

13 DATED: April 30, 2009
14

15 Bingham McCutchen LLP
16

17
18 By: /s/ William F. Abrams
19 William F. Abrams
Bingham McCutchen LLP

20 Attorneys for Plaintiff
21 The Board of Trustees of The Leland
Stanford Junior University
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1 DATED: April 30, 2009

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3 Thompson & Knight LLP

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5 By: /s/ Jessica B. Magee

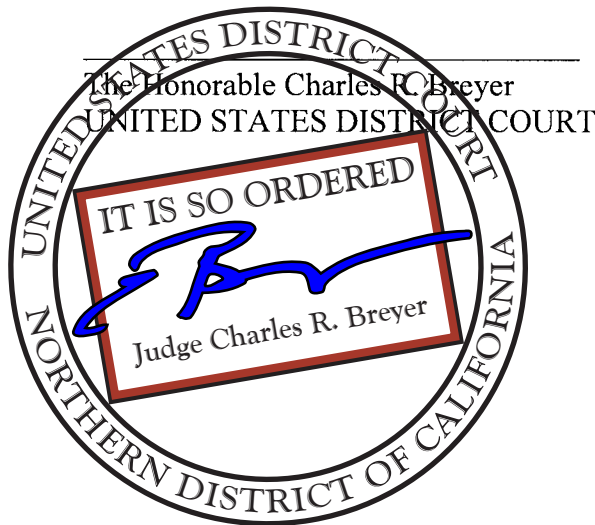
6 Jessica B. Magee
7 Thompson & Knight, LLP

8 Attorneys for the Receiver for Defendants
9 Stanford Financial Group Company and
10 Stanford Group Company

1 **NOW THEREFORE, IT IS HEREBY ORDERED THAT** the time for Stanford to
2 respond to Defendant Stanford Group Company's counterclaims is extended from May 8, 2009
3 to June 12, 2009.

4 **IT IS FURTHER ORDERED** that the time for the Defendants to respond to pending
5 discovery requests is extended from May 4, 2009 to June 5, 2009.

6
7
8 DATED: May 4, 2009



PROOF OF SERVICE

I hereby certify that on April 30, 2009, I caused a true and correct copy of the document entitled STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO DEFENDANT STANFORD GROUP COMPANY'S COUNTERCLAIMS, to be electronically filed in accordance with Civil L.R. 5-5(b) and General Order No. 45. Accordingly, all counsel of record who are deemed to have consented to electronic service were served with true and correct copies of the above documents via the Court's CM/ECF system. All counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the above document via U.S. Mail, addressed as follows:

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(RECEIVER)

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(COUNSEL FOR RECEIVER)

DATED: April 30, 2009

/s/ William F. Abrams

William F. Abrams